

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

JUN 15 2016

UNITED STATES OF AMERICA,
)
)
Plaintiff,
)
)
v.
)
STEPHEN A. TURNER,
)
Defendant.
)

STEPHEN C. WILLIAMS
U.S. MAGISTRATE JUDGE
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

CASE NO. 16-mj-7048

CRIMINAL COMPLAINT

I, Christopher W. Williams, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief.

PRODUCTION OF CHILD PORNOGRAPHY

On or about January 25, 2016, in Madison County, within the Southern District of Illinois,

STEPHEN A. TURNER,

defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor, L.O., to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and attempted to do so, that being a digital photograph of that minor's genitals, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce, all in violation of Title 18, United States Code, Section 2251(a) and (e).

AFFIDAVIT

I, Christopher W. Williams, being duly sworn, state that the following is true to the best of my knowledge and belief:

1. I, Christopher W. Williams, being duly sworn, depose and state that I am a Senior Special Agent with the United States Secret Service and have been so employed since May, 1997. I am currently assigned to the United States Secret Service, Springfield Resident Office,

Fairview Heights Domicile, where my duties include providing assistance in support of investigations involving missing or exploited children. During my time as a Special Agent with the United States Secret Service, I have consulted with experts and specialists trained in the analysis of computers, computer storage and the transference of information through the use of computer technology. I have participated in numerous computer crime investigations and investigations involving the sexual exploitation of children, specifically, violations of Title 18 U.S.C, Sections 2251, 2252, 2252A and 2422. As a commissioned Senior Special Agent of the United States Secret Service, I am authorized to make arrests for any offense against the United States committed in my presence or for any felony cognizable under the laws of the United States, in accordance with Title 18 U.S.C., Section 3056.

2. This affidavit is in support of a complaint and arrest warrant against Stephen A. Turner, who employed, used, persuaded, induced, enticed or coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate commerce.

3. The following information is known to me or was reported to me by law enforcement officers and other cooperating individuals through reports, interviews, or other verbal and written communications.

Investigation of Stephen Turner

4. On 06/07/2016, Sgt. Ronald J. Harris from the Wood River Police Department received an email forwarded by Detective Sergeant David Vucich of the Madison County Sheriff's Office, Edwardsville, Illinois, from the Internet Crimes Against Children task force (ICAC). This email explained that a Detective Michael McNealy from Florida was investigating an enticement and production of child pornography case and had found that the suspect, Stephen

A. Turner was from the Wood River, Illinois area. The email contained a photo of the suspect, Stephen Turner, who Sergeant Harris knew and furthermore knew him to live in Wood River, within the Southern District of Illinois.

5. Sergeant Harris made contact with Detective McNealy who advised that this investigation started in the beginning February 2016, when an 11 year old female, hereafter referred to as "LO," reported that she had met an older male on a game application for her phone. She advised that they began to text and send pictures back and forth using various text and photo applications such as "Textnow" and "Skype." "LO" admitted that she had taken pictures of her chest and vagina and sent them to the male, who she knew as Stephen. These pictures were viewed by the initial responding deputy and were confirmed to be child pornography in that he described them as pictures that "LO" has taken of her chest and vagina and sent to Stephen. The deputy also described seeing pictures on the phone that Stephen had taken of his face and penis and sent to "LO."

6. Det. McNealy was given the girl's phone as evidence and a forensic download was completed. He reported that in this forensic download he saw evidence of the nude pictures that were sent from "LO" to Stephen and that Stephen sent to "LO." The pictures of "LO" would be classified as child pornography. Detective McNealy also advised that he was able to review chat sessions between Stephen and "LO" and observed them to be sexual in nature. He further advised that he could see in the chat sessions that Stephen was coaching "LO" on which pictures to take and how to manipulate her body. Specifically, and as an example, the following communications were observed:

On 1/25/16, at 3:24:23 PM (UTC-5), an image was sent from 618-999-7557, depicting a subject, who Sgt. Harris of the Wood River Police Department, Wood River, IL, would later identify as Stephen A. Turner.

On 1/26/16, at 3:58:19 PM (UTC-5), "LO" received a message from 618-999-7557 with the message, "Get a closer pic of your privates..."

On 1/26/16, at 3:58:38 PM (UTC-5), "LO" forwarded a message to 618-999-7557, containing file 1452986804679.jpg. This image depicts what appears to be a close-up photograph of an early pubescent female's vagina.

On 1/26/16, at 3:59:59 PM (UTC-5), "LO" received a message from 618-999-7557 with the message "Spread the lips of your privates n take a pic".

On 1/26/16, at 4:02:14 PM (UTC-5), "LO" forwarded a message to 618-999-7557, containing file 1453842099155.jpt. This image depicts what appears to be a close-up photograph of an early pubescent female's vagina.

7. On 6/13/16, Special Agent Vincent E. Pescitelli, U.S. Secret Service, applied for and received a Search Warrant for the residence of Stephen A. Turner, from the U.S. District Court for the Southern District of Illinois, under U.S. District Court Case Number 16-mj-7047.

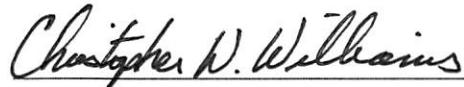
8. On 6/14/16, Special Agents of the U.S. Secret Service and officers of the Wood River Police Department and O'Fallon Police Department executed the U.S. District Court Search Warrant on the residence of Stephen A. Turner. At the time the Search Warrant was executed, the residence was occupied by Stephen A. Turner, his live-in girlfriend and his live-in girlfriend's minor children, including an 11 year old girl, hereafter referred to as "IE." During the course of this search, various electronic items were seized, including Stephen A. Turner's cellular telephone.

9. Continuing on 6/14/16, Stephen A. Turner was interviewed at his residence and at the Wood River Police Department. Prior to any questioning, Stephen A. Turner was advised of his *Miranda* rights via a Wood River Police Department form. During the course of this interview, Turner admitted to knowingly sending lascivious pictures of his genitalia to "LO" on

several occasions. Turner admitted to knowingly requesting and receiving pictures of "LO" which included the lascivious display of the genitals of "LO". Turner enticed "LO" via a long-term chat relationship using the "Textnow" application to graphically photograph her vagina and breasts. Turner would then instruct "LO" to send him the said photographs via the "Textnow" application using her cellular telephone.

10. Turner further admitted to creating a second profile "persona" within the "Textnow" application and communicated with "LO" in order to receive additional photographs containing the lascivious display of her genitals.

FURTHER AFFIANT SAYETH NAUGHT.



Christopher W. Williams, Senior Special Agent

State of Illinois)
) SS.
County of St. Clair)

Sworn to before me and subscribed in my presence on the 15th day of June 2016, at East
St. Louis, Illinois.



STEPHEN C. WILLIAMS
United States Magistrate Judge

JAMES L. PORTER
Acting United States Attorney



Laura Reppert
Assistant United States Attorney